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Via ECF

Judge Dale E. Ho
United States District Judge
Southern District Court of New York
500 Pearl Street
New York, New York 10007

**Re: Bianca Nieves v. Reddit, Inc.,
Docket No. 23-CV-04817**

Your Honor,

Pursuant to the Court's October 24, 2023, Order (ECF No. 9), the Parties write jointly regarding the status of the case. The Parties have an initial telephonic pretrial conference scheduled for December 7, 2023, at 11:30 PM (ECF No. 9).

1. This matter is an employment discrimination case where Plaintiff alleges she was discriminated against based on her sex, race and national origin and retaliated against after engaging in a protected activity, in violation of the New York City Human Rights Law ("NYCHRL"). Defendant contends that it had a legitimate business reason for Plaintiff's termination that in no way relates to her sex, race, national origin or any alleged engagement in protected activity and Plaintiff will not be able to demonstrate that Defendant's legitimate reasons for her termination were pretextual.

Pursuant to the Complaint, Plaintiff is seeking lost wages, emotional distress damages, attorney's costs and fees, punitive damages, and other damages the court deems fit. Defendant denies that Plaintiff is entitled to any relief sought in the Complaint as Defendant did not engage in any unlawful activities for which relief can be granted.

2. This Court has subject matter jurisdiction over Plaintiff's claims pursuant to 42 U.S.C. §2000e-5(f)(3) and 28 U.S.C. §§ 1332(a) and (c), 1441. Diversity of citizenship exists because Plaintiff is a New York resident and corporate Defendant Reddit's place of incorporation is Delaware and its principal place of business is in California. This Court has supplemental jurisdiction over Plaintiff's claims under the NYCHRL pursuant to 28 U.S.C. § 1367. Venue is proper in this District pursuant to 28 U.S.C. §§ 112 and 1441(a).

3. There are currently no pending deadlines in this action. The joint Civil Case Management Plan and Scheduling Order submitted by the parties together with this joint status letter includes proposed deadlines.

4. There are currently no pending motions and the Parties do not expect to make any applications at the Initial Conference but reserve the right to file such motions should the facts or circumstances of this matter change as to warrant such a filing.

5. The parties have not yet exchanged discovery. The Parties will exchange Initial Discovery pursuant to the Court's Protocols for Employment Matters as well as in accordance with the joint Civil Case Management Plan and Scheduling Order submitted by the parties together with this joint status letter.

6. The Parties attended a mediation session with a Court appointed mediator that was not successful. Thereafter, the parties have continued to meaningfully discuss settlement.

7. The Parties do not believe use of alternate dispute resolution mechanisms are practical at this time.

Thank you for time and attention to this matter.

Respectfully submitted,

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